

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Oversee the
Resource Adequacy Program, Consider Program
Reforms and Refinements, and Establish Forward
Resource Adequacy Procurement Obligations

Rulemaking 21-10-002
(Filed October 7, 2021)

**CORRECTED NOTICE OF EX PARTE COMMUNICATION
BY VIAVI SOLUTIONS**

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On Behalf of
VIAVI SOLUTIONS

January 25, 2023

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OF THE STATE OF CALIFORNIA**

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Resource Adequacy Program, Consider Program
Reforms and Refinements, and Establish Forward
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Pursuant to Rule 8.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), Viavi Solutions (“Viavi”), as an interested party, hereby provides a corrected notice of an ex parte meeting in the above-captioned proceeding. Inadvertently, the reference to an advisor from a different office was included in the original Notice. Kelsey Choing of Commissioner Genevieve Shiroma’s Office was present at the meeting.

Attending the meeting on behalf of Viavi, were Robert Ule, CRE Senior Manager, Chris Roth, Corporate Legal Lead and Morgan Dalton, Research Scientist.

Viavi initiated the meeting, which was held via Webex on Friday, December 7, 2022, starting at 3:00 p.m., and lasting approximately 15 minutes. Viavi presented its proposal that all California geothermal electricity should be converted from 24/7 operation to be scheduled to only operate when the sun doesn’t shine. This would significantly flatten the “Duck Curve” and enable the State to achieve its 100% renewable energy goals faster and cheaper, as geothermal can meet about half of the State’s evening energy requirements. The key issues discussed included:

1. The amount of geothermal electricity is limited by the annual amount of steam (water) the fields can produce. This fixed amount of energy should not be pulled during the day when solar is available, only at night, so fewer energy storage devices are needed.
2. Geothermal producers need support to invest in more wells and generating equipment so they can increase their maximum rate of generation (peak power capability)
3. Existing transmission lines will need to also be upgraded to allow higher nighttime peak power from the geothermal fields
4. Steam generation is not as “responsive” as other generating equipment. They should be “programed” to run at night as opposed to being held in standby as a demand response resource.
5. This proposal has been shared with other key stakeholders, all of which expressed interest in advancing this proposal.

Respectfully submitted,



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